



Timothy F. Winter, President  
707 Wilshire Blvd., Suite 2075, Los Angeles, CA 90017  
Tel: (213) 403-1300 • Fax: (213) 403-1350  
Email: [twinter@parentstv.org](mailto:twinter@parentstv.org) • [www.parentstv.org](http://www.parentstv.org)

*The nation's most influential advocacy organization  
protecting children against sex, violence and profanity in entertainment*

May 6, 2019

BY ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Ex Parte* Notice  
TV Ratings System and Oversight Monitoring Board, Docket No. 19-41

Dear Ms. Dortch:

On Monday, April 29<sup>th</sup>, representatives of the Parents Television Council visited the FCC Building in person to deliver 3-ring binders holding more than 1,400 petitions signed by PTC members from across the nation. We entered the main lobby and presented ourselves, and the petitions, to the security officers. We asked that the binders be delivered to Chairman Pai's office, along with an accompanying cover letter to the Chairman (with cc to the other four FCC Commissioners).

The security officers advised us that they were unable to accept a drop-off of physical documents; and they instructed us instead to send the binders via US Mail to the following address:

9050 Junction Dr., Annapolis, MD 20701

We followed the instructions and have received a delivery confirmation at that address.

As this may be considered an *Ex Parte* communication to the FCC regarding the above-referenced matter, we wanted to make sure it was disclosed publicly via this electronic filing. A copy of the letter to Chairman Pai and a copy of the petition wording are attached to this *Ex Parte* letter.

Respectfully submitted,

Timothy F. Winter  
President



Timothy F. Winter, President  
707 Wilshire Blvd., Suite 2075, Los Angeles, CA 90017  
Tel: (213) 403-1300 • Fax: (213) 403-1350  
Email: [twinter@parentstv.org](mailto:twinter@parentstv.org) • [www.parentstv.org](http://www.parentstv.org)

*The nation's most influential advocacy organization  
protecting children against sex, violence and profanity in entertainment*

April 29, 2019

The Honorable Ajit Pai, Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Dear Chairman Pai:

Herewith please find the petitions of 1400 concerned citizens, parents, and grandparents who believe that the TV Content Ratings System has fallen short of the promises made to the public when it was formally adopted by the FCC over 21 years ago. The petitions call on you to hold public hearings to explore ways to make TV ratings work better for families.

We are now only two weeks from the deadline Congress imposed on the FCC to report on the accuracy and accountability of the TV ratings system. You've already received online public comments and reply comments from more than 1,700 individuals or organizations, imploring the FCC to address the lack of consistency and transparency in the industry's administration of the TV ratings. And we also know that lobbyists from the entertainment industry recently met with the Media Bureau to argue for maintaining the status quo.

Before you finalize your report to Congress, I urge you to carefully weigh the preponderance of public comments and these petitions – filed by those for whom the ratings system was created – against the lone, hypocritical voices of entertainment industry lobbyists.

Hollywood tells parents to rely on the TV Content Ratings System to choose safe and age-appropriate television shows, just as they ask us to rely on the movie rating system. But at the same time, Hollywood profits financially from marketing explicit sex, graphic violence, and profanity to our children through TV and movies by labeling them as appropriate for children.

That's a win-win scenario for the entertainment industry, but it's lose-lose for families. Research suggests that the TV ratings system is failing parents. In fact, Parents Television Council research has consistently proven that the TV ratings are inaccurate and that ratings always err on the side of exposing children to more adult content.

A 2016 study published in *Pediatrics* found that TV ratings “were ineffective in discriminating shows for 3 out of 4 behaviors studied [violence, sexual behavior, alcohol use, and smoking in TV shows]. Even in shows rated for children as young as 7 years, violence was prevalent, prominent, and salient.”

In its meeting with the Media Bureau, and in two other public comments posted on the FCC’s website, Hollywood lobbyists argued against improving the current TV ratings system or to bringing greater awareness or transparency for the public. In other words, they are suggesting that the 22-year-old TV ratings system, which was created half a generation before Google, Netflix or the iPhone existed, needs no modernizing, no updates, and no changes whatsoever.

Television networks are financially motivated not to rate their programming higher than TV-14; otherwise advertisers who are looking to reach broad audiences will leave, and many viewers won’t watch. So the broadcast networks end up rating all of their programming TV-PG or TV-14, regardless whether the content warrants a higher rating. Keep in mind that there are no TV-MA-rated shows on broadcast television, despite that Parents Television Council research found that the violent shows on broadcast TV have essentially similar levels of violence as the most violent cable TV shows.

In their Ex Parte letter of April 8<sup>th</sup>, the Hollywood lobbyists made a number of easily-refuted excuses to maintain the status quo. Here are just a few:

1) They claim that the “TV ratings are subjective.” But the ratings system and its oversight were created precisely to provide consumers with **objective** guidance. It’s even spelled out on the TV Parental Guidelines Monitoring Board’s website:

<http://www.tvguidelines.org/resources/TheRatings.pdf>. When the industry gives this weak excuse, they’re doing so only to hide behind a veil of subjectivity and avoid public accountability.

2) Hollywood says they don’t get complaints about inaccurately-rated TV shows. Of course they don’t! Why would they get complaints when most Americans have never even heard of the TV Parental Guidelines Monitoring Board? Most Americans have no any idea that it is their obligation to contact the board if they believe a rating is wrong. Most Americans (and even the content creators in Hollywood with whom I’ve spoken about this) believe that the TV content ratings are applied by an independent group, just as the MPAA does for movies; but that is not the case for TV shows. The broadcast and cable networks that assign the age rating for their own shows sit on the very oversight board tasked with ensuring that TV ratings are accurate.

3) Hollywood’s lobbyists claim parents say the ratings system works and that they are satisfied. This is true if the conclusion is based upon the polling data that the entertainment industry bought and paid for. But based upon more than 1,700 public comments to the FCC concerning the TV content rating system, 100% of Americans who are not entertainment industry lobbyists publicly stated some level of concern or dissatisfaction with explicit or age-inappropriate content reaching children.

Here’s a head-scratcher: Even the MPAA’s own lobbyist is advocating to protect a TV content rating system that is inferior to the MPAA’s content rating system!

Children deserve to be protected from harmful media content, and one way to do so is to label that content with an age-based rating system that is accurate, consistent, transparent and accountable to the public. Right now it is none of those four things.

While we understand that the scope of the FCC's current regulatory review of the TV Content Ratings System was narrowly defined by Congress; and while we understand that the First Amendment may be a gating factor for the FCC's actions, surely the Commission's formal report back to the Congress could serve as a **catalyst** for positive change.

Now is the time for the FCC to consider how it can help to modernize the content rating system for the benefit of the American people, not to protect the status quo for Hollywood lobbyists who profit from an outdated and broken system.

Sincerely,



Timothy F. Winter  
President

cc: Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks

Petition to FCC Chairman Mr. Ajit Pai  
I Want Public Hearings to Make TV Safer for America's Children!

Dear Chairman Pai,

As a supporter of the Parents Television Council (PTC), I strongly urge you hold public hearings exposing the TV networks' rigged "content ratings system." PTC research confirms that TV networks routinely violate the current system. They mis-rate shows to fool parents into thinking their children are watching innocent shows when in fact the networks are poisoning their minds with harmful sex, violence, and profanity. Please hold tough hearings to make TV safer for America's children.

[signed]